

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JAMES ST. LOUIS,	(
PLAINTIFF,	(C. A. No. 06-236-SLR
v.	(JURY TRIAL REQUIRED
LT. CHERYL MORRIS, ET AL,	(
Defendant.	(

MOTION FOR SERVICE OF INJUNCTION

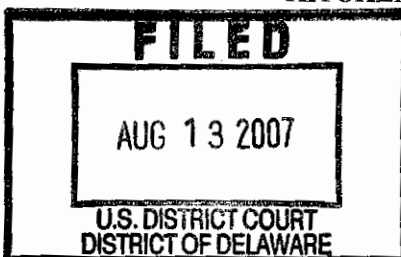
Pursuit to Framer v. Brennan 114 S.Ct. 1970: Prison officials' deliberate indifference to a substantial risk of serious harm to an inmate violates the 8th Amendment.

A person officially violates the 8th Amendment when two (2) requirements are met:

1. the deprivation alleged must be objectively sufficiently serious
2. prison officials must have a culpable state of mind. *Id.* @834.

FACT TO SUPPORT THIS ACTION

- ISSUES OF CONSTITUTIONAL VIOLATIONS OF INMATES SUPERVISING, DIRECTING, THREATENING, VERBALLY ABUSING AND SCHEDULING JOBS AND JOB ASSIGNMENTS ARE ALL DOCUMENTED AND ACKNOWLEDGED BY THE PRISON AND HAVE BEEN REPORTED TO PRISON OFFICIALS WITHOUT ACTION BEING TAKEN EXCEPT VERBALLY TO RESPOND BY SAYING IT IS ILLEGAL AND TO STOP.
- MAIN PRISON OFFICIALS HAVE WARNED KITCHEN OFFICIALS THAT THIS PRACTICE THEY ARE DOING IS NOT ONLY A CONSTITUTIONAL VIOLATION BUT A PRISON VIOLATION
- ALL PRISON OFFICIALS HAVE FAILED TO STOP THIS PRACTICE IN NOT ONLY THE KITCHEN BUT ALL OTHER AREAS OF PRISON EMPLOYMENT.



- AS RECENTLY AS THE LAST 30 DAYS 3 INCIDENTS HAVE BEEN DOCUMENTED WITH SUSPENSION AND TERMINATION OF INMATES EXCEPT THOSE IN THEIR 'SUPERVISORY POSITIONS' AS INMATE 'BOSES'.
- ONE INCIDENT INVOLVED A 5 FOOT COOKING PADDLE THAT INMATE USED BECAUSE HE BELIEVED HE NEEDED TO PROTECT HIMSELF FROM AN 'INMATE SUPERVISOR' .BOTH WERE SUSPENDED FOR A FEW DAYS HOWEVER THE INMATE WHO WAS NOT THE BOSE WAS TERMINATED WHILE THE INMATE SUPERVISOR WHO STARTED THE ABUSE WAS PUT BACK IN CHARGE.
- THIS ACTION NOT ONLY APPLIES TO DOC AT SMYRNA BUT TO ALL PRISONS IN THE STATE OF DELAWARE AS YOU CAN SEE FROM THE DISCOVERY RECEIVED BY THIS COURT ON JOB DESCRIPTIONS PER PRISON OWN PAPER WORK.
- PRIOR TO PETITIONER'S CIVIL ACTION INMATES HAVE BEEN SEXUALLY ASSULTED, COERCED, EXTORTED AND ABUSED BY THESE SO CALLED PRISON INMATE SUPERVISORS ALONG WITH INSIDENTS OF OFFICER ABUSE WHERE OFFICERS WERE TRANSFERRED INSTEAD OF PROSECUTED.
- BEFORE AN INMATE OR PRISON GUARD IS INJURED OR KILLED OR THERE IS A MASS RIOT BECAUSE OF THIS ABUSE, WHICH IS BEING TALKED ABOUT, PLAINTIFF EMPLOYS THIS COURT TO STOP THES ILLEGAL ACTION WITH AN INJUNCTION AND MAKE OUR PRISON SYSTEM ACCOUNTABLE FOR THEIR ACTIONS. PLAINTIFF HAS SENT A TRUE COPY OF THIS DOCUMENT TO THE DELAWARE DEPT. OF JUSTICE IN WILLMINGTON DELAWARE

DATE.....8/10/07.....
JAMES STLOUIS
1181 PADDOCK RD
SMYRNA DELAWARE 19977

James St. Louis

Certificate of Service

I, JAMES ST. LOUIS hereby certify that I have served a true and correct copy(ies) of the attached MOTION TO SEVER upon the following parties/persons:

To: DEPARTMENT OF JUSTICE

STATE OF DELAWARE

820 N FRENCH ST.

WILMINGTON DELAWARE 19801

To:

To:

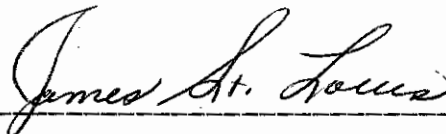
To:

To:

To:

BY PLACING IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correction Center, Smyrna, DE 19977.

On this 10 day of Aug, 2007



JAMES ST. LOUIS

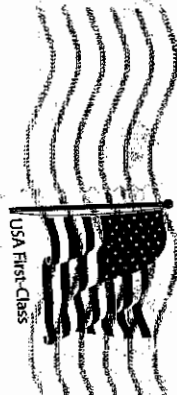
SBI # 00446518

IM James A. Jones
SBI# 446518 UNIT D/E
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

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